



June 8, 2018

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20054

RE: Tower Crew Shortage

Dear Ms. Dortch

Over the last several months Stainless has partnered with many broadcasters involved in the Incentive Auction repack to complete channel transitions prior to their originally scheduled phase completion date. These early channel transitions have been widely referred to as taking place in "Phase zero".

Several of the stations that have moved from later phases to phase zero are using Stainless for their tower and installation work. These stations had all engaged Stainless prior to the *ex parte* letter of April 30, 2018 so they were already factored in to Stainless' repack schedule. Stainless fully supports these early moves as they provide benefit to the entire repack program by increasing tower crew resources in subsequent repack phases necessary to keep the transition process on the desired schedule for everybody involved.

Stainless has sufficient installation capacity to complete all the phase zero installations for which it has committed and is fully ready to support the broadcasters in their efforts.

Respectfully Submitted,

Donald Doty  
Business Development Manager